



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

APR 12 2011

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Memorandum

Subject: Waiver of Supplemental Ethics Regulations

From: Steven Bradbury, Deputy Ethics Official
Office of Pesticide Programs (7501P)

To: Michael Lowit, Ecologist
Environmental Fate and Effects Division, ERB1



I am granting you a waiver in accordance with 5 CFR 6401.102(b) of the Supplemental Standards of Ethical Conduct for Employees of the Environmental Protection Agency (EPA) to allow you to retain your financial holdings in (b) (6)

In general, employees of the EPA's Office of Pesticides Programs are prohibited by 5 CFR 6401.102(a)(2) from holding any financial interest in a company that manufactures or distributes wholesale pesticides registered by the EPA. However, based on your letter of recusal and the information you have provided in your memo of April 11, 2011, I have reviewed the circumstances surrounding your financial holdings in these companies and determined that waiving the prohibition would not be inconsistent with 5 CFR 2635 or otherwise prohibited by law, and your retention of these holdings will not result in an appearance of misuse of position or loss of impartiality, or otherwise result in a loss of confidence in the impartiality and objectivity with which the Agency administers its pesticide programs.

This waiver will remain in effect as long as the relevant circumstances remain substantially the same, but you are required to report to me any changes in the circumstances surrounding your holdings in these three companies or your duties in OPP that could result in an appearance of misuse of position or loss of impartiality. I must also caution you that you should avoid any future purchases of stock in these companies or other companies involved in the manufacture or distribution of pesticides. You should also update your recusal periodically and whenever you have a new supervisor.

If you have any questions, please contact me or my ethics assistant, Debby Sisco at 308-8121.

cc: Debby Sisco